

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL PACKAGE SERVICE (FCPS)
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-2

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
HAGENSTEIN TO INTERVENOR AMERICAN POSTAL WORKERS
UNION, AFL/CIO'S INTERROGATORY APWU/USPS-T1-4
(July 28, 2021)**

The United States Postal Service hereby responds to Intervenor American Postal Workers Union, AFL/CIO'S Interrogatory APWU/USPS-T1-4 to United States Postal Service Witness Steven B. Hagenstein, issued on July 20, 2021. The question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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APWU/USPS-T1-4

Please refer to page 3, footnote 6 of your testimony where you note an "increased challenge with respect to driver shortages/availability or motor vehicle accidents." Describe both the nature of and numbers associated with the current challenges with driver availability and accidents that you anticipate will not be impacted by or aggravated by the FCPS service standard changes.

RESPONSE:

For clarity, the text of the testimony to which the footnote refers states:

"Moreover, through improved surface transportation capacity utilization and consolidation, we expect to require fewer surface transportation trips over a given period than we currently require." The subject footnote 6 goes on to state: "As a result, we do not anticipate increased challenges with respect to driver shortages/availability or motor vehicle accidents." The ability to reduce network mileage and trips by increasing routing efficiencies attributed to the proposed service standard change provides a measure of mitigation against market conditions in the trucking industry. Although HCR suppliers are having difficulty retaining and hiring drivers, the Postal Service intends to use contract surface transportation more efficiently, and thus use fewer trips; fewer trips in turn imply fewer impacts caused by driver shortages or accidents. HCR accidents are not tracked.